

# MEMO ENDORSED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOHN DOE,

Plaintiff,

-against-

THE CHILDREN'S VILLAGE,  
WESTCHESTER COUNTY,  
WESTCHESTER COUNTY DEPARTMENT  
OF SOCIAL SERVICES,  
JASON BROWN,  
and ELLIOT PERRYMAN,

Defendants.

05 Civ. 737 (CLB) (LMS)

**AFFIDAVIT FOR  
JUDGMENT BY DEFAULT  
AGAINST DEFENDANT  
JASON BROWN**

ECF CASE

Alan Vinegrad, Esq., being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and am a partner with the firm of Covington & Burling, attorneys for plaintiff in the above-entitled action. I am familiar with the facts and circumstances underlying this action.

2. I make this affidavit pursuant to Rule 55.1 and 55.2(a) of the Civil Rules for the Southern District of New York, in support of plaintiff's application for the entry of a default judgment against defendant Jason Brown.

3. This is an action to recover compensatory and punitive damages from defendant Brown and others to plaintiff for the harms that plaintiff suffered in a series of assaults and sexual assaults at the hands of defendants Perryman and Brown in November 2003 at The Children's Village, a residential treatment center in Dobbs Ferry, New York.

*This document was docketed at a Motion (Doc No. 22) which it is not treated as a Motion, the Motion is denied. The default to appear or plead of Jason Brown is noted. No judgment will enter unless it resolves all claims against all defendants. See Rule 54, F.R.C.P. May 2, 2005*

*Charles Brown  
DSD*